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Via Facsimile

Honorable Charles L. Brieant, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

RECEIVED

*Application Granted
to Brieant
7/20/2007 Charles L. Brieant
USDJ*

Re: Anne Bryant et al. v. Europadisk et al.
07- CV-3050

Dear Honorable Judge Brieant:

We were recently substituted as counsel for defendants Media Right Productions, Inc., Douglas Maxwell and The Orchard Enterprises, Inc. in the above referenced matter. The parties are presently awaiting a new date for Court ordered mediation.

The scheduling order entered into by prior counsel on July 13, 2007 requires that all depositions are to be completed by December 1, 2007 and formal requests for documents and interrogatories no later than September 20, 2007.

The purpose of this correspondence is to request additional time to submit requests for documents and for depositions. We anticipate noticing the plaintiff individuals for their depositions, in addition to a rule 30(b)(6) representative. Similarly, the plaintiffs will also need to notice depositions and consent to an extension of time to complete discovery.

We respectfully request that the Court allow the parties until January 31, 2008 to complete depositions and until January 15, 2008 to request production of documents.

We apologize to the Court for the delay and will certainly ensure that we meet the extended deadlines.

Respectfully,

Alana D. Mitnick